

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

**IN RE: RIO PIEDRAS EXPLOSION
LITIGATION**

CIVIL NO. 96-2443 (JAF)

THIS DOCUMENT RELATES TO
CIVIL CASES NO. 97-1107, 97-1578, 97-
2585, 97-2586, 97-2717, 97-2718, 97-2720,
97-2721.

MOTION IN COMPLIANCE WITH ORDER

TO THE HONORABLE COURT:

COME NOW plaintiffs, in the Related Cases Numbers 97-1107, 97-1578, 97-2585, 97-2586, 97-2717, 97-2718, 97-2720 and 97-2721, through their undersigned attorneys, and to this Honorable Court respectfully inform as follows:

1. On October 14, 2004, this Honorable Court issued an order in which it ordered all the plaintiffs to submit to the Clerk of the Court within sixty (60) days an Informative Motion attesting to the fact that notice was issued to all their clients and to provide a listing of all those whom he/she was unable to contact.

2. In compliance with said Order, the undersigned informs to this Honorable Court that on November 1, 2004, the undersigned sent a letter to each of its clients to their last known addresses stating the contents of the Order and informing them of the time period provided to claim their payments before the Clerk of the Court.

3. As of today, the letters sent to the following plaintiffs were returned to our offices as “undeliverable”:

- a. Ivonne López Ponce
- b. Delfín López Rodríguez

c. Elizabeth Poggi Reyes

d. Yolanda Poggi Reyes

When the abovementioned letters were returned to our offices, we contacted the operator and verified in the Metropolitan area listings in order to inquire about possible new listings, to no avail. Therefore, the undersigned has not been able to contact the abovementioned plaintiffs.

4. Also, the undersigned has just become aware that due to an oversight the abovementioned letter was not sent to plaintiff St. Paul Fire & Marine Insurance Company (Civil Num. 97- 2720) and it was thus immediately sent on this same date by fax. Therefore, an extension of thirty (30) days is respectfully requested in order for plaintiff St. Paul Fire & Marine Ins. Co., to claim their payment.

5. Due to the above, plaintiffs respectfully request from this Honorable Court that pursuant to its October 14, 2004 Order, those amounts pertaining to plaintiffs Ivonne López Ponce, Delfin López Rodríguez, Elizabeth Poggi Reyes, Yolanda Poggi Reyes and St. Paul Fire and Marine Insurance Company be deposited in an interest bearing account until claimed by each plaintiff (¶4 of Order, Dkt. 3748) and that an extension of thirty (30) days be granted in order for plaintiff St. Paul Fire & Marine Ins. Co., to claim their payment.

WHEREFORE, it is respectfully requested that this Honorable Court takes notice of the above mentioned, and that pursuant to its October 14, 2004 Order, those amounts pertaining to plaintiffs Ivonnen López Ponce, Delfin López Rodríguez, Elizabeth Poggi Reyes, Yolanda Poggi Reyes and St Paul Fire and Marine Ins. Company be deposited in an interest bearing account until claimed by each plaintiff (¶4 of Order, Dkt. 3748) and that an extension of thirty (30) days be granted in order for plaintiff St. Paul Fire & Marine Ins. Co., to claim their payment.

Respectfully submitted.

CERTIFICATE OF SERVICE: I hereby certify that a true and correct copy of this document has been served on this same date to Francisco A. Besosa, Esq., Adsuar Muñoz Goyco & Besosa, Hato Rey Tower, Suite 1400, 268 Muñoz Rivera Avenue, Hato Rey, Puerto Rico 00918; and to Liza Ramírez de Arellano, Esq., Bauzá & Dávila, 63 Fortaleza Street, San Juan, Puerto Rico 00901.

In San Juan, Puerto Rico, this 13th day of December, 2004.

NACHMAN & GUILLEMARD

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